

Memorandum

TO: Sara Sparks, EPA
 Dan Wall, EPA
 Brian Sanchez, EPA
 Keith Large DEQ

FROM: Trustee members of the Smurfit BTAG

RE: Smurfit Mill Site, Frenchtown, Montana - Comments on Collection of Additional Background TEQ Dioxin Sediment Data.

As per our agreement at March 9, 2017 BTAG meeting, the Trustee members of the BTAG are submitting the following comments on collection of additional background sediment sampling data:

The Preliminary Data Summary Report seems to only have one background sediment sample for TEQ dioxin and furans and based upon this lack of adequate data, we request additional data be collected for use in future analyzes. In the order of priority, the locations of the requested data collection are listed in Table 1. The general areas of the sample locations are on Map 1:

Table 1

| Priority | Stream | Sediment Sample Location Description | Coordinates | |
|----------|------------------|---|------------------|-------------------|
| 1 | South Bitterroot | On National Forest in West Fork of the Bitterroot River near Painted Rocks Lake | 45° 43' 15.24" N | 114° 17' 01.85" W |
| 2 | Fish Creek | On National Forest in Fish Creek | 46° 55' 38.57" N | 114° 41' 55.90" W |
| 3 | Petty Creek | On National Forest in Petty Creek | 46° 51' 02.50" N | 114° 16' 16.86" W |

In total three (3) samples are requested from these sites, one at each location using the Site's existing approved sampling protocols. Samples should be taken from instream sediments on the National Forest in areas of the creeks where fine sediments are deposited, if possible. If there are any questions about these sample locations, please contact Tom Mostad, at NRDP 406.444.0227.

Map 1

